

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

DECLARATION OF JEFF E. BUTLER

I, Jeff E. Butler, declare and state as follows:

1. I am an attorney associated with Clifford Chance US LLP, counsel for Defendant Dexia Bank Belgium (“Dexia”), and admitted *pro hac vice* to practice before this Court. I have personal knowledge of the facts set forth herein. I submit this declaration in support of Dexia’s Opposition to Plaintiffs’ Motion for Reconsideration of the Portion of the July 10, 2006 Order Denying Plaintiffs’ Motion to Compel Dexia Bank Belgium to Produce Piet Cordonnier for Deposition.
2. Dexia notified Plaintiffs that documents bearing bates numbers DBB 003712 to DBB 005751 were available for production on June 10, 2005.
3. Dexia notified Plaintiffs that documents bearing bates numbers DBB 035264 to DBB 041322 were available for production on September 9, 2005.
4. Dexia notified Plaintiffs that documents bearing bates numbers DBB 049901 to DBB 059670 were available for production on September 19, 2005.
5. The deposition of Jacques Janssens took place on April 20-21, 2006.

6. The deposition of Patrick Van Tiggel took place on May 23, 2006.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
August 8, 2006

A handwritten signature in black ink, appearing to read "Jeff E. Butler", written above a horizontal line.

Jeff E. Butler